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Beast Holdings, LLC; MrBeastYouTube,
LLC; and GameChanger247, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

BEAST HOLDINGS, LLC;
MRBEASTYOUTUBE, LLC; and
GAMECHANGER247, LLC,
Plaintiffs,

CV No.

**DECLARATION OF SUE PARISHER IN
SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER**

v.

PRIVATE BY DESIGN, LLC, a North
Carolina limited liability company; Doe
Defendants 1-20; WWW.SHOP-
MRBEAST.COM, a domain name; and
PORKBUN, LLC, a Oregon limited
liability company,

Defendants.

I, Sue Parisher, hereby declare and state as follows:

1. I am the general manager for Plaintiffs Beast Holdings, LLC, MrBeastYouTube, LLC, and GameChanger247, LLC (together, "MrBeast"), in this case. I am a citizen of the United States and of the State of North Carolina, over the age of eighteen (18) years and not a party to the above-entitled proceeding. This declaration is based on my personal knowledge.

2. MrBeast is the brand created by my son, James S. Donaldson ("Jimmy"). Jimmy is a YouTube artist, businessman, and philanthropist. He began posting videos to YouTube in early 2012 at the age of 13. His programming has been wildly successful, and as of June 2021, the MrBeast channel on YouTube has 63.4 Million subscribers worldwide, and its posts have been viewed more than 11 Billion times. The MrBeast channel is ranked 13th in the world by total subscriber rankings, and it is in the top one percent of creators in the United States. Jimmy is "MrBeast."

3. In addition to the primary YouTube channel, Jimmy also has five other YouTube channels. Collectively, all of the channels have 103.5 Million subscribers, and have been viewed more than 14.5 billion times.

4. Jimmy owns the principal interest in three limited liability companies that hold and use the intellectual property and assets of the MrBeast brand; Beast Holdings, LLC, MrBeast YouTube, LLC, and GameChanger247, LLC.

5. Beast Holdings, LLC is a limited liability company with its principal place of business located at 740 SE Greenville Boulevard, Suite 400-163, Greenville, North Carolina.

6. MrBeastYouTube, LLC is a limited liability company with its principal place of business located at 740 SE Greenville Boulevard, Suite 400-163, Greenville, North Carolina.

7. GameChanger247, LLC is a limited liability company with its principal place of business located at 740 SE Greenville Boulevard, Suite 400-163, Greenville, North Carolina.

8. MrBeast, is the exclusive owner of its famous trademarks MRBEAST (Trademark Reg. No. 5,930,575), MRBEAST GAMING (Trademark Ser. No. 88/921,390), various versions of the MrBeast “Beast” logo (Trademark Reg. No. 5,850,491; Ser. Nos. 88/921,402 and 88/921,397), and the MrBeast Lightning Bolt Logo (Trademark Reg. No. 6,212,346), all of which are either registered or the subject of pending applications with the United States Patent and Trademark Office in connection with clothing (the “MrBeast Trademarks”).

9. MrBeast is also the exclusive owner of the copyrights in the artwork and designs for the Beast logo and Lightning Bolt logo, and such artwork and designs are registered with the United States Copyright Office (Copyright Reg. No. VA 2-134-088). Many of the copyrighted artworks currently being used on the official MrBeast website (www.shopmrbeast.com) (the “Official Website”) are being displayed on the infringing website in this case (www.shopmrbeast.com) (the “Infringing Website”). This includes the Beast logo and Lightning Bolt logo, which conveys the misimpression that the Infringing Website is affiliated or associated with the Official website. It appears that this is being done by the Defendants to confuse consumers into believing that they are on the Official Website when they are attempting to purchase MrBeast branded products.

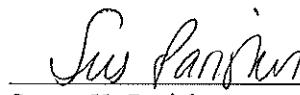
10. MrBeast started its first YouTube channel ten years ago and has been developing its brand ever since. Over the past three years, MrBeast has spent over forty (40) million dollars in advertising, marketing, and production to promote the MrBeast brand. In addition to its YouTube videos, clothing, and merchandise line, MrBeast also offers a restaurant brand

(MrBeast Burger), a business mobile app (Finger on the App), a series of television and film projects, a developing snack enterprise (Feastables), and several major sponsorship relationships with Fortune 500 companies, including PayPal, EA, and Coinbase.

11. I have reviewed the Declaration of Kristie-Ann Yamane filed in support of this motion. The declaration lists several individuals and email addresses that are purportedly associated with “MrBeast” through the Infringing Website. MrBeast has not licensed the use of its trademarks, copyrights, or other intellectual property to any of the parties or individuals identified in the Declaration. The only authorized users of the MrBeast intellectual property are the plaintiffs in this litigation.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

SIGNED in Greenvillle NC on this 23 day of July, 2021.



Susan K. Parisher